

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff

vs.

2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC.,

Defendants

Case No. 1:17-cv-02635

Judge Christopher A. Boyko

**PLAINTIFF'S OBJECTIONS AND COUNTER-DESIGNATIONS TO DEFENDANTS'
DEPOSITION DESIGNATIONS**

Plaintiff, James Hayden, submits the following objections and counter-designations to Defendants' deposition designations (Dkt. # 174-1) pursuant to the Court's April 27, 2022 Order. Mr. Hayden's counter-designations are not an admission that such testimony is appropriate for use by Defendants at trial. Mr. Hayden objects to the extent Defendants' attempt to submit deposition testimony from a non-party, non-testifying witness (or individual) on hearsay grounds. Mr. Hayden also objects to Defendants' attempt to submit deposition testimony for any witness that Mr. Hayden calls live at trial.

Further, Mr. Hayden reserves the right to submit any deposition testimony designated by Defendants or counter-designated by Mr. Hayden as if he affirmatively designated such testimony; to supplement his designations, including designations for authentication purposes; and to use any deposition testimony that does not appear in these designations for purposes of impeachment. Mr. Hayden continues his investigations and trial preparations and reserves the right, in appropriate circumstances and in accordance with all applicable Federal Rules, Local Rules, and Court Orders, to amend, supplement, and/or withdraw his designations, including, but

not limited to, in response to further negotiations between the parties, Court Orders and rulings, and other developments in the case.

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
Witness: James Hayden			
9:1-9:3		9:4-11	
9:10-9:15			
13:24-13:25			
14:1-14:11		17:9-10	
21:25-22:2	FM		
24:2-24:3			
25:1-25:3	FM, SP		
25:20-25:25	RV	26:1-22	
26:25-27:1	RV		
29:22-30:4	FM		
30:5-30:6	NT		
30:8-30:9	FM		
30:10-30:12			
30:13-30:14	NT		
30:16-30:16	IH		
30:17-30:23	IH		
30:24-30:25	NT		
31:2-31:2	IH		
31:3-31:3	NT		
31:5-31:5	IH		
31:23-31:25	NT		
32:5-32:5	FM		
32:6-32:14			
34:3-34:6	FM, IH, RV		
37:9-37:11	RV		
38:10-38:11	NT		
38:13-38:13	FM, IH, RV		
38:14-38:16	FM, RV		
38:15-38:16	FM, RV		
38:17-38:19	FM, RV		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
38:22-38:24	FM, RV		
39:4-39:7	NT		
39:10-39:14	FM, RV		
39:15-39:17	NT		
39:23-39:23	FM, RV		
39:24-39:25	NT		
40:2-40:2	FM		
41:9-41:10	NT		
41:12-41:18	RV	41:19–25	
42:1-42:3	NT		
42:5-42:5	FM, IH, RV		
42:16-42:18	NT		
42:20-42:20	FM, IH, RV		
43:3-43:5	NT		
43:7-43:7	FM, IH, RV		
43:13-43:16	FM, IH, RV		
44:6-44:8	NT		
44:10-44:10	FM, IH, RV		
47:2-47:12			
47:13-47:16	FM		
47:17-47:19			
48:10-48:18			
48:22-48:25			
49:1-49:6	RV		
49:13-49:15	NT		
49:17-49:17	FM		
50:1-50:7			
50:13-50:18	RV		
50:18-50:18	RV		
51:3-51:4	NT		
51:6-51:8	FM, RV	51:9–16	
52:3-52:9			
55:17-55:21			
56:11-56:12	NT		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
56:14-56:17		56:20–22	
58:3-58:5		57:18–58:10	
58:11-58:12	NT		
58:14-58:15	FM	58:20–24	
58:25-59:2	NT		
59:4-59:4			
60:15-61:1	FM, RV		
61:3-61:9	FM, RV, LC		
61:16-61:20	FM		
61:20-61:20	FM		
61:21-61:23	NT		
62:6-62:9	RV	62:10–11	
62:20-62:25	RV		
65:19-65:22	AA, SP	65:16–18	
65:24-66:1	SP		
66:16-66:22	RV		
67:12-67:13	NT		
67:15-67:17	RV		
69:12-69:15	NT		
69:17-69:17	FM, RV, LC		
69:18-69:19	NT		
69:21-69:21	FM, RV, LC		
71:23-71:25	NT		
72:2-72:2			
72:15-73:3			
75:8-75:18	AA, FM	73:25 – 75:7	
75:20-75:20	FM		
77:12-77:14	NT		
77:21-77:21	FM, RV, LC		
77:22-77:24	NT		
78:1-78:1	FM, RV, LC		
78:2-78:5	NT		
78:7-78:7	FM, RV, LC		
78:20-78:22	NT		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
78:24-78:24	FM, RV, LC		
78:25-79:2	NT		
79:9-79:9	FM, RV, LC		
79:10-79:11	FM, RV, LC		
81:2-81:7	FM		
81:25-82:1	NT		
82:3-82:3	AF, FD		
82:6-82:13		82:19 – 83:5	
84:19-84:23		83:21 – 84:18	
85:8-85:9	NT		
85:11-85:11			
90:13-90:22			
91:1-91:3			
91:4-91:9			
92:1-92:4	RV		
92:5-92:7	NT		
92:9-92:9	RV		
92:10-92:12	NT		
92:19-92:19	FM, RV, LC		
93:3-93:7			
93:9-93:9		93:10–13	
93:14-93:15			
93:16-93:24			
94:1-94:1			
94:6-94:8			
94:9-94:14			
94:13-94:15			
94:17-94:21	LC, RV		
94:23-94:23			
95:8-95:14		95:4 – 7	
95:16-95:16			
95:20-96:9			
96:11-96:12	MR		
96:14-96:19	MR		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
97:2-97:3	NT		
97:5-97:5	FM		
97:9-97:13			
97:18-97:24			
99:23-99:25	NT		
100:2-100:10			
100:15-100:16			
112:13-112:16			
112:24-113:2			
113:8-113:15			
113:16-113:18	RV		
114:12-114:13	NT	114:1 – 11	
114:15-114:15	RV		
115:15-115:18			
115:16-115:21	MR		
115:23-115:23	MR		
116:20-116:23			
117:2-117:4	MR, RV, FM		
117:7-117:9	NT		
117:11-117:11	MR, RV, FM		
118:5-118:6	NT		
118:8-118:9			
118:19-118:22	MR, RV, FM		
119:1-119:12			
119:21-119:23	NT		
119:25-120:6			
120:8-120:11			
120:13-120:13			
120:19-120:22	NT		
120:24-120:24	LC, RV, FM		
126:16-126:23			
126:25-127:1			
127:6-127:16	LC, FM		
128:25-129:3	NT		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
129:5-129:5	MR, FM, LC, AF		
129:6-129:9	NT		
129:11-129:11	MR, FM, LC, AF		
129:20-130:1	NT		
130:8-130:8	MR, FM, AF	130:8 – 14	
130:17-130:22	MR, FM, AF		
130:23-131:3	NT		
131:4-131:4			
132:2-132:4	MR, MD		
132:6-132:12	NT		
132:14-132:14	MR, MD		
132:15-132:15	NT		
132:17-132:19	MR, MD		
132:20-133:7	MR, MD		
133:16-133:17	MR, MD		
134:21-134:23	MR, MD		
134:25-134:25	MR, MD		
134:25-135:11	MR, MD		
136:10-136:12	NT		
136:14-136:14			
137:8-137:18	NT		
137:20-137:20	LC, RV, FM		
139:12-139:17	AF, RV		
139:19-139:19	AF, RV		
142:9-142:11	NT		
142:14-142:16	FM, RV		
142:17-142:19	NT		
142:21-142:25	FM, RV		
143:2-143:3			
144:1-144:3	NT		
144:5-144:5	RV, LC, FM		
144:22-144:24	NT		
145:1-145:1	RV, LC, FM		
145:4-145:6	NT		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
145:8-145:8	RV, LC, FM	145:9 – 17	
148:17-149:1	RV, LC, FM		
150:8-150:12	MR, RV, LC, FM	149:8 – 150:7	
152:3-152:5	NT		
152:7-152:7	FM, MR, RV, LC		
155:14-155:19	FM, LC		
155:22-155:25	NT		
156:2-156:2	FM, LC		
156:3-156:11	FM, RV, IH		
156:13-156:13	FM, RV, IH		
158:13-158:17	SP		
160:17-160:18	NT		
160:20-160:20	FM, RV, IH, FD		
161:20-162:11	AS, FM, RV, SP	162:12 – 15	
173:6-173:12	SP, RV		
177:24-178:6			
178:11-178:15		178:16 - 19	
178:20-178:22			
179:20-179:23		179:1 – 19	
180:1-180:4			
180:22-181:8		181:9 – 182:9	
182:10-182:12		182:13 - 21	
182:22-183:2			
183:8-183:10			
184:2-184:3	NT		
184:5-184:5			
186:21-186:25			
187:19-187:21			
189:19-189:22	RV, LC, FM		
190:9-190:14		190:15 – 18	
190:19-190:24			
191:12-191:21			
192:1-192:4			
192:14-192:22		192:5 – 13	

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
192:23-193:2			
194:8-194:20			
194:21-195:6			
195:10-195:12			
196:24-197:4			
197:15-197:18			
203:1-203:4			
203:8-203:12			
204:18-204:21	RV		
205:16-205:20	RV, FM		
208:10-208:11	NT		
208:13-208:17			
208:19-208:25			
209:2-209:6	RV, FM, SP		
209:8-209:19	NT, FM, RV, SP		
209:21-209:25	FM, RV, SP		
210:2-210:5	FM		
210:8-210:9	NT		
210:11-210:12			
210:14-210:16	FM		
210:18-210:22	FM		
210:24-211:2	FM	211:3 – 212:1	
212:4-212:8	NT		
212:10-212:12	FM		
212:14-212:16	FM		
212:21-212:25	FM, LC		
213:2-213:6	FM, LC		
213:8-213:16	FM, LC		
221:1-221:4	FM, LC		
Witness: LeBron James			
10:3-10:6			
18:1-18:3		18:4 – 5	
18:6-18:9			

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
18:22-18:24		19:10 – 19, 20:3 – 22:13, 23:7 – 18, 28:15 – 34:11	
34:12-34:23		34:24 – 38:25	
39:1-39:9		39:10 – 40:13	
40:14-40:19			
45:5-45:24		44:3 – 45:4	
45:25-46:12		46:13 – 48:9	
48:10-48:12			
48:15-48:16			
48:18-48:21			
48:22-49:8		49:9 – 15	
49:16-49:23			
50:2-50:9		50:10 – 15	
50:16-51:3		51:4 – 7	
51:8-51:23		51:24 – 55:7	
55:8-55:10			
55:12-55:12			
55:14-55:19		55:20 – 56:16, 56:21	
66:14-67:3		58:21 – 59:2, 60:9 – 25, 61:25 – 62:5, 62:14 – 64:18, 67:12 – 73:2	
73:20-73:23		74:3 – 7	
74:9-74:14			
75:11-76:5			
76:7-76:13			
76:16-76:21			
76:23-76:24			
77:2-77:10			
77:15-77:18			
77:20-77:25			
78:5-78:5			
78:7-78:9			
78:10-78:23		78:24 – 79:7	

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
79:10-79:12			
79:16-79:18			
79:20-79:25		80:4 – 80:11	
81:5-81:19			
81:22-81:22		82:9 – 19, 90:17 – 91:10, 93:14 – 94:9	
103:20-104:1			
104:2-104:3			
104:6-104:8		104:10 – 105:1	
106:11-106:16	LC, LD		
107:2-107:14	LD		
108:7-108:16	LD		
108:19-109:4	LD		
109:6-109:9	LD		
109:10-109:14	LD		
109:16-109:19	LD		
109:20-110:23	LD		
110:25-111:13	LD		
111:15-111:18	LD		
111:21-112:11	RV		
112:12-112:16	LD, FM, LC		
112:19-112:19	LD, FM, LC		
112:21-113:6	LD, LC		
113:9-113:12	LD, LC		
113:14-114:1	LD, LC		
114:4-114:4	LD, LC		
114:6-114:13	LD		
114:15-114:18	LD		
114:21-115:2	LD, LC		
115:5-115:5	LD, LC		
115:7-115:13	NT, LD		
115:15-115:15	LD		
115:17-115:17	NT		
115:19-115:19	LD		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
115:21-116:7	RV		
116:9-116:9	LD, RV		
116:11-116:21	NT, LD		
116:23-116:23	LD		
116:25-116:25	NT, LD		
117:2-117:2	LD		
117:4-117:9	NT, LD		
117:11-117:11	LD		
117:13-117:14	LD		
117:17-118:10	LD, RV		
118:14-118:21	LD, RV		
118:22-119:4	LD, RV		
119:8-119:11	LD, SP, IH, RV		
119:13-120:1	LD, RV		
120:3-120:3	LD, RV, LC		
120:5-120:5	NT, LD		
120:7-120:7	LD, LC		
120:9-120:11	NT, LD		
120:14-120:15	LD, LC, MR		
120:17-120:25	NT, LD		
121:2-121:2	LD, LC		
121:4-121:4	NT, LD		
121:6-121:6	LD, LC		
121:8-121:18	NT, LD		
121:20-121:20	LD, MR		
121:22-121:23	LD, MR		
122:2-122:9	NT, LD		
122:11-122:11	LD, RV		
122:13-122:13	NT, LD		
122:15-122:15	LD, RV		
122:17-122:19	NT, LD		
122:22-122:22	NT, LD		
122:25-123:6	LD, RV, LC		
123:8-123:13	NT, LD		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
123:15-123:15	LD, LC		
123:17-123:17	NT, LD		
123:19-123:19	LD, LC		
123:21-123:23			
124:15-124:20	NT, LD	124:2 – 7	
124:22-124:22	LD, LC		
124:24-124:25	LD, LC		
125:3-125:11	NT, LD		
125:13-125:13	LD, LC		
125:15-125:15	NT, LD		
125:17-125:17	LD, LC		
125:19-126:9	LD, LC		
126:12-126:14	LD, LC		
126:17-127:7	LD, FM, LC		
127:11-127:13	LD, FM, LC		
127:15-127:23	NT, LD		
127:25-127:25	LD		
128:2-128:2	NT, LD		
128:4-128:4	LD		
128:6-128:14	LD, RV	129:16 – 130:9	
Witness: Danny Green			
7:6-7:11		15:8 – 17:3, 17:10 – 23, 21:17 – 22:2	
22:3-22:5			
22:18-22:20			
22:23-22:25			
23:4-23:12		23:13 – 24:7, 27:14 – 30:6, 31:18 – 32:23, 33:8 – 20	
33:21-33:25			
34:2-34:10			
34:12-34:16			
35:16-35:20		35:21 – 36:14, 38:10 – 12, 40:21 – 42:16,	

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
		43:5 – 44:24, 45:6 – 52:16	
51:18-51:24			
52:3-52:16			
57:16-57:18		56:3 – 57:6,	
58:15-58:24		58:25 – 59:8	
65:11-65:13		63:8 – 65:10, 65:14 – 67:14, 72:23 – 76:18	
76:19-76:25			
77:2-77:15		77:16 – 78:11	
82:11-82:17		82:18 – 83:13	
83:14-83:24		83:25 – 84:24	
95:14-95:16			
95:18-95:21		98:6 – 107:25	
108:2-108:7			
108:10-108:25			
109:2-109:3		109:9 – 18, 110:21 – 114:13	
125:24-126:7		116:6 – 124:21	
126:24-127:6		130:10 – 131:22	
132:8-132:12	LD, AA, RV		
132:18-132:20	NT		
133:2-133:2	LD, AA, RV		
133:3-133:4	NT		
133:10-133:10	LD, AA, RV		
133:11-133:14	NT		
133:20-133:25	LD, AA, RV, LC		
134:2-134:6	LD, AA, RV, LC		
134:7-134:12	NT		
134:18-134:25	MR, LD, LC, RV, AA		
135:2-135:2	MR, LD, LC, RV, AA		
135:8-135:9	MR, LD, LC, RV, AA		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
135:18-135:19	NT		
136:7-136:21	LD, AA, RV		
136:22-136:22	LD, AA, RV		
137:5-137:18	LD, AA, RV		
138:6-138:9	LD, AA, RV		
138:12-138:18	LD, AA, RV		
138:21-138:21	LD, AA, RV		
139:17-139:25	LD, AA, RV		
140:2-140:9	LD, AA, RV, MR		
140:12-140:21	LD, AA, RV, MR		
141:3-141:5	LD, AA, RV, MR		
141:8-141:15	LD, AA, RV		
141:18-141:18	NT		
141:21-141:25	LD, AA, RV		
142:2-142:19	LD, AA, RV		
142:20-142:25	NT		
143:2-143:9	LD, AA, RV		
143:12-143:13	NT		
143:16-143:25	LD, AA, RV		
144:2-144:5	NT		
144:7-144:8	LD, AA, RV, LC		
144:10-144:10	LD, AA, RV, LC		
144:13-144:25	LD, AA, RV, LC		
145:2-145:8	LD, RV		
145:11-145:11	LD, RV		
145:12-145:25	NT		
146:2-146:2	NT		
146:5-146:7	LD		
146:10-146:10	LD		
146:11-146:25	LD, RV		
147:2-147:14	LD, RV		
147:15-147:25	LD, RV, AA		
148:2-148:5	NT		
148:8-148:9	LD, RV, AA		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
148:12-148:16	LD, RV, AA		
148:19-148:19	LD, RV, AA		
148:25-148:25	NT		
149:2-149:3	NT		
149:6-149:7	LD		
149:8-149:25	LD, FM, MR		
150:2-150:6	LD, AA, FM, MR		
150:7-150:20	LD, FM, MR, AA, LC		
150:23-150:25	LD, FM, MR, AA, LC		
151:4-151:10	LD, FM, MR, AA, LC		
151:13-151:17	NT		
151:20-151:23	LD, LC, RV		
151:24-151:25	LC, RV		
152:2-152:2	NT		
152:5-152:5	FM, LC, RV		
152:6-152:14	LD, LC, FM		
152:17-152:20	LD, LC, FM, RV		
152:23-152:25	LD, RV		
153:2-153:5	LD, LC, RV		
153:8-153:18	LD, LC, RV, AA		
153:21-153:25	LD, LC, RV, AA		
154:2-154:9	LD, AA, RV		
154:12-154:20	AA, RV		
155:2-155:13	NT		
155:16-155:18	LD, MR, AA, LC, SP		
155:21-155:25	LD, MR, AA, LC, SP		
156:2-156:4	LD, AA, MR		
156:15-156:24	NT		
157:3-157:4	LD, AA, FM, MR		
157:7-157:13	LD, AA, FM, MR		
157:16-157:17	LD, AA, FM, MR		
157:20-157:20	LD, AA, FM, MR		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
157:21-157:25	NT		
158:7-158:7	LD, FM, AA, LC		
158:8-158:20	NT		
158:23-158:25	LD, MR, AA		
159:4-159:4	LD, MR, AA		
159:10-159:16	NT		
159:20-159:25	LD, FM, AA, MR, LC		
160:2-160:10	NT		
160:13-160:16	LD, MR, SP, FM, RV		
160:17-160:20	NT		
160:23-160:25	LD, SP, RV		
161:2-161:12	NT		
161:15-161:17	LD, FM, SP, RV		
161:20-161:25	LD, FM, SP, RV		
162:2-162:5	NT		
162:7-162:8	LD, AA, SP, FM, RV, MR		
162:11-162:19	LD, AA, SP, FM, RV, MR		
162:22-162:23	LD, AA		
163:2-163:14	LD, AA, LC, RV		
163:17-163:19	LD, AA, LC, RV		
163:22-163:25	LD, AA, LC, RV		
164:2-164:11	LD, AA, LC, RV		
164:20-164:25	NT		
165:2-165:7	NT		
165:9-165:11	LD, AA, LC, RV		
165:13-166:13	LD, AA, LC, RV		
166:16-166:22	LD, MR, AA, FM, RV		
166:25-166:25	LD, MR, AA, FM, RV		
167:2-167:15	NT		
167:18-167:19	LD, MR, AA, RV		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
167:22-167:22	LD, MR, AA, RV		
167:23-167:25	NT		
168:2-168:15	LD, RV		
168:16-168:25	NT		
169:2-169:7	NT		
169:10-169:12	LD, RV, AA		
169:16-169:19	NT		
169:23-169:23	LD, RV, AA		
169:24-169:25	NT		
170:2-170:2	NT		
170:6-170:19	LD, RV, AA		
170:20-170:24	NT		
171:3-171:17	LD, RV, AA, LC		
171:20-171:22	LD, RV, AA, LC		
171:25-171:25	LD, RV, AA, LC		
172:2-172:13	LD, RV, SP, RV		
172:16-172:16	NT		
172:19-172:19	LD, RV, SP, RV		
173:6-173:17	LD, LC, RV, AA		
173:20-173:21	NT		
173:24-173:25	LD, LC, RV, AA		
174:2-174:4	NT		
174:7-174:7	LD, LC, RV, AA		
174:8-174:11	NT		
174:14-174:14	LD, MR, RV, AA		
174:18-174:20	NT		
174:23-174:23	LD, RV, AA		
175:6-175:14	NT		
175:17-175:17	LD, MR, AA		
176:14-176:21	NT		
176:23-176:24	LD, MR, AA, RV		
177:3-177:7	LD, MR, AA, RV		
177:10-177:13	LD, RV, AA		
177:16-177:21	LD, MR, RV, AA		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
177:25-177:25	LD, AA, RV		
178:2-178:7	NT		
178:20-178:20	LD, RV, MR		
191:11-191:22		180:15 – 182:14, 185:2 – 9, 185:21 – 25, 188:3 – 189:25	
192:4-192:10			
192:11-192:14			
192:22-192:25			
193:2-193:25			
194:4-194:9			
Witness: Tristan Thompson			
8:13-8:16			
19:23-19:25			
20:6-20:10		20:25-21:7	
35:7-35:12		35:13-25	
36:2-36:4			
36:9-36:13			
37:3-37:5		36:22-37:1	
43:12-44:5			
44:7-44:10			
45:7-45:15		45:2-6	
46:23-47:5		45:16-46:22	
50:23-51:9		51:10-53:20	
63:6-64:5			
93:19-94:5	LD		
95:12-96:19	LD, LC		
96:20-97:11	LD, FM		
97:16-97:16	LD		
97:17-99:2	LD, LC, FM		
99:5-99:5	FM		
99:7-100:1	LD, LC		
100:4-100:21	LD, LC, FM		
100:24-100:24	FM		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
101:2-101:18	LD, LC		
101:22-102:12	LD, LC, FM		
102:15-102:15	FM		
104:8-104:9	AA, NT		
104:13-105:14	AA, LC, LD		
105:17-105:17	FM		
105:19-106:16	LD, LC		
106:17-107:6	LD, LC, FM		
107:9-107:9	FM		
107:11-107:23	LD, AF, FM		
108:1-108:1	FM		
109:9-109:23		110:13-24	
Witness: Jon Hayden			
8:4-8:9	NT		
11:23-12:3	RV		
12:10-12:11	RV		
13:15-13:19	RV		
22:17-22:23	RV/FM	23:6-17, 30:20-31:16	
39:18-39:20	RV/FM/FD		
39:23-40:1	RV/FM		
40:3-40:10	RV/FM		
40:22-41:3	RV/FM		
41:4-41:6	RV/FM/LC		
41:9-41:15	RV/FM/LC		
49:7-49:9	RV/FM		
49:12-49:12	RV		
52:25-53:2	NT		
53:4-53:4	RV/FM/LC		
54:4-54:14	RV/FM		
55:8-55:15	RV/FM		
55:17-55:17	RV/FM		
56:11-56:13	NT		
56:15-56:15	RV/FM		
59:15-59:18	RV		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
60:22-61:4	RV		
61:5-61:8	RV/FM		
61:10-61:12	RV/FM		
61:14-61:14	RV/FM		
69:4-69:6	NT		
69:8-69:8	RV/FM		
70:4-70:5	NT		
70:8-70:8	RV/FM/LC		
70:9-70:10	NT		
70:12-70:12	RV/FM/LC		
71:2-71:12	RV/FM		
71:15-71:15	RV/FM	71:22-72:3	
72:13-72:15	NT		
72:17-72:19	RV/FM		
72:22-73:2	RV/FM/LC		
73:5-73:9	RV/FM		
74:4-74:14	RV		
80:23-80:25	RV		
93:25-94:2	NT		
94:5-94:5	RV/FM		
97:22-97:24	RV		
98:10-98:15	RV		
103:6-103:12	RV		
115:3-115:13	NT/RV	108:16-109:2	
117:3-117:5	RV		
117:6-117:10	RV		
117:11-117:13	NT		
117:16-117:16	RV/FM		
127:8-127:11	RV	130:8-18, 136:21-137:3	
187:12-187:14	NT		
187:17-187:25	RV/FM		
188:3-188:3	RV/FM		
188:4-188:5	NT		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
188:7-188:10	RV/FM		
188:13-188:13	RV/FM/LC		
190:10-190:16	RV/FM		
190:18-190:20	NT		
190:23-190:24	RV/FM		
190:25-191:13	NT/RV		
191:16-191:24	RV		
191:25-192:5	NT		
192:8-192:9	RV/FM/MD		
192:23-193:2	NT		
193:5-193:5	RV/FM/SP		
193:6-193:8	NT		
193:19-193:19	RV/FM/SP		
193:20-193:22	NT		
193:25-193:25	RV/FM/SP		
201:1-201:8	RV		
206:1-206:10	RV		
206:13-206:15	RV/FD		
207:1-207:4	RV/FM		
207:7-207:7	RV/FM		
248:6-248:8	RV/FD	255:3-256:5	
260:24-261:15	NT/RV		
262:15-262:18	RV		
263:13-263:14	NT		
263:23-263:25	RV/RM		
264:7-264:18	NT/RV		
265:6-265:8	RV/FM		
266:20-267:9	NT/RV		
268:4-268:5	NT		
268:8-268:10	RV/FM/FD		
268:11-268:11	RV		
268:14-268:19	NT/RV		
268:21-269:9	RV		
269:12-269:20	RV		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
270:6-270:16	RV		
272:5-272:21	NT/RV		
273:22-274:12	NT/RV		
274:16-274:16	RV/FM/FD		
276:8-276:13	RV		
276:15-276:16	RV/FM		
276:18-276:19	RV/FM		
276:23-276:23	NT		
277:1-277:2	RV/FM/FD		
277:3-277:4	NT		
277:7-277:7	RV/MR		
277:9-277:22	NT/RV		
278:2-278:4	RV		
278:13-278:14	NT		
278:16-278:22	RV/FM		
278:25-279:4	RV/FM	278:22-279:11	
279:12-279:13	NT		
279:16-279:16	RV/FM		
279:25-280:14	NT/RV	280:22-282:2	
281:1-281:3			
281:6-281:7			
281:22-281:23			
282:1-282:2			
282:3-282:19	NT/RV		
283:5-283:7		282:23-283:20	
285:3-285:21	NT/RV		
285:22-286:23		285:25-286:3	
300:2-300:7	RV		
308:5-308:7	NT		
308:10-308:10	RV/SP/FD		
316:23-316:25	NT		
317:2-317:2	RV/FM		
317:12-317:16	NT		
317:17-317:17	RV/FM/LC		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
320:6-320:7	NT		
320:9-320:12	RV/FM		
320:15-320:16	RV/SP		
321:11-321:12	NT		
321:15-321:15	RV/SP		
322:6-322:8	RV		
324:21-324:22	NT		
324:25-325:2	RV/FD		
325:5-325:8	RV/LC		
327:13-327:14	NT		
327:16-327:24	RV/FM		
328:2-328:2	RV/LC		
328:13-328:15	NT		
328:18-328:22	RV/LC		
328:25-328:25	RV/FM		
336:24-336:25	NT		
337:3-337:5	RV/FM		
Witness: Bernardino Tovanche			
7:12-7:15	RV		
8:4-8:9	RV		
9:24-10:8	RV		
10:12-10:12	RV/IH/SP		
11:18-11:20	NT		
11:24-12:7	RV/FM/IH/SP	13:4-14:10, 16:6-21	
21:1-21:1	NT		
21:4-21:7	RV/FM	21:16-22:1	
22:8-22:9	NT		
22:12-22:17	RV/SP	22:8-23:4	
22:20-23:5			
23:8-23:8	RV/FM/SP	24:5-22, 26:17-27:1	
30:20-30:20	NT		
30:23-31:9	RV/FM/NT/FD		
31:18-31:20	RV/FD		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
32:18-32:21	RV		
32:22-33:4	RV		
33:21-34:1	RV	33:6-20	
34:4-34:15	RV/IH		
34:18-34:23	RV/SP		
35:1-35:2	RV/FD/SP		
36:3-36:4	NT		
36:7-36:14	RV/SP		
36:15-37:4	RV		
37:7-37:9	RV/FM		
46:20-46:24	RV		
47:7-48:23	RV		
54:20-54:22	NT		
54:25-55:4	RV/FM/LC		
55:7-55:11	RV/FM		
55:15-55:18	RV/FM/LC		
55:21-55:24	RV/FM/LC		
56:2-56:2	RV/FM/LC		
56:3-56:5	NT		
56:8-56:8	RV/SP		
56:15-56:17	NT		
56:20-56:23	RV/LC		
56:25-56:25	NT		
57:5-57:7	RV/MR/SP/LC		
57:10-57:10	RV/FM		
86:4-86:22	RV/NT		
86:25-87:7	RV/FD/SP		
87:20-87:20	NT		
87:25-88:19	RV		
89:12-89:13	NT		
89:16-89:20	RV/FM		
89:21-89:21	NT		
89:24-90:3	RV/FM		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
90:6-90:6	NT		
90:9-90:12	RV/FM		
90:20-90:20	NT		
90:23-90:23	RV/FM		
91:7-91:9	RV/FM		
91:13-91:18	RV		
95:24-95:25	NT		
96:4-96:4	RV/FM/IH/SP		
96:20-96:20	NT		
96:24-97:2	RV/FM/IH/SP		
97:4-97:4	RV/FM	99:20-100:2	
102:1-102:3	NT		
102:9-102:11	NT		
102:14-102:14	RV/SP/FD		
102:15-102:17	NT		
102:20-102:20	RV/SP		
102:25-103:2	NT		
103:5-103:5	RV/SP/FD		
103:9-103:12	NT		
103:15-103:16	RV/SP/FD		
103:20-103:22	RV/FM		
103:25-104:5	RV		
104:8-104:11	RV/LC		
104:14-104:14	RV/FM		
105:4-105:7	NT		
105:11-105:11	RV/FM		
105:14-105:16	NT		
105:19-105:24	RV/SP/FD		
106:25-107:1	NT		
107:4-107:4	RV/FM		
107:5-107:7	NT		
107:10-107:10	RV/FM		
108:3-108:7	RV		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
108:10-108:10	RV/FM		
108:13-109:2	NT		
109:7-109:9	NT		
109:22-109:22	NT		
109:25-110:1	RV/SP/FD		
110:6-110:9	NT		
110:12-110:21	RV/FM/SP		
110:24-111:2	RV/FM		
111:5-111:5	RV/SP		
113:24-114:3	RV		
114:4-114:4	RV		
114:5-114:6	NT		
114:9-114:9	RV/SP		
114:18-114:20	RV/FM		
116:9-116:10	NT		
116:13-116:23	RV/FM/HR		
117:5-117:19	NT/RV		
117:22-117:25	RV/MD		
118:1-118:2	NT		
118:5-118:6	RV/FM		
118:9-118:9	RV/MD		
118:10-118:10	NT		
118:13-118:15	RV/MD		
118:16-118:16	RV/MD		
118:17-118:20	RV/MD		
118:23-118:24	RV/FM		
119:2-119:3	NT		
119:6-119:6	RV/FM		
119:9-119:9	NT		
119:13-119:13	RV/FM		
122:5-122:7	NT		
122:10-122:11	RV/SP/FD		
122:12-122:14	NT		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
122:17-122:17	RV/FM		
123:1-123:3	NT		
123:6-123:13	RV/FM/LC		
124:5-124:7	NT		
124:9-124:9	RV/FM/LC		
124:10-124:12	NT		
124:14-124:17	RV/FM/LC		
124:20-124:20	RV/FM/LC		
124:21-124:23	NT		
125:1-125:1	RV/FM/LC		
125:13-125:15	NT		
125:17-125:20	RV/FM/LC		
125:22-126:1	RV/FM/LC		
126:13-126:14	NT		
126:17-126:17	RV/SP		
127:3-127:6	RV		
127:16-128:13	NT/RV		
128:19-128:20	RV/FM		
128:21-128:25	RV		
128:24-129:3	RV		
129:4-129:5	NT		
129:8-129:14	RV/MR		
129:17-129:23	RV/SP/FD		
130:1-130:9	RV/FM		
130:15-130:17	RV	132:10-134:5	
133:7-133:8	RV		
133:9-133:17			
134:6-134:9	RV		
134:13-134:25	RV/IH/SP		
135:3-135:10	RV/SP/FD		
135:13-135:16	RV/LC		
135:18-135:20	RV/LC		
135:25-136:4	NT		
136:8-136:8	RV/FM/LC		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
136:14-136:15	RV/FM		
136:18-136:18	RV/SP/FD		
138:11-138:15	RV/FM/SP		
138:18-138:22	RV/FM		
138:25-139:3	RV		
140:4-140:6	RV		
140:15-140:17	RV		
141:7-141:25	NT/RV		
142:16-142:17	NT		
142:20-142:22	RV/FD		
143:23-144:4	RV		
144:7-144:11	RV/SP/FD		
144:14-144:17	RV/FM/SP/FD/LC		
144:20-144:20	RV/FM/SP/FD/LC		
144:21-144:22	NT		
144:24-145:2	RV/FM/SP/FD/LC		
145:4-145:7	RV/FM/SP/FD/LC		
145:9-145:11	RV/FM/SP/FD/LC		
145:13-145:15	RV/FM/SP/FD/LC		
148:10-148:12	RV		
149:2-149:3	NT		
149:6-149:7	RV/FM		
151:1-151:2	NT		
151:5-151:6	RV/FM		
151:10-151:13	RV		
151:14-151:25	NT/RV		
152:3-152:6	RV		
152:25-153:1	NT		
153:5-153:9	RV/SP/IH		
154:10-154:10	NT		
154:13-154:19	RV/FM/SP/IH		
155:5-155:6	NT		
155:11-155:15	RV/FM/FD		
155:23-155:24	NT		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
156:1-156:1	NT		
156:5-156:17	RV/SP/MR		
158:10-158:13	NT		
158:16-158:20	RV/FM/SP/FD/LC		
158:24-158:25	RV/FM/SP/FD/LC		
159:1-159:2	NT		
159:5-159:5	RV/SP/FD		
159:12-159:16	RV		
159:19-159:21	RV/SP/FD		
159:25-159:25	RV/SP/FD/LC		
160:1-160:2	RV/SP/FD/LC		
160:5-160:7	RV/SP/FD/LC		
160:10-160:12	RV/SP/FD/LC		
160:14-160:15	RV/SP/FD/LC		
161:8-161:10	RV/SP/FD/LC		
161:13-161:15	RV/FM/SP/FD/LC		
161:17-161:19	RV/FM/SP/FD/LC		
161:21-161:23	RV/FM/SP/FD/LC		
162:1-162:1	RV/FM/SP/FD/LC		
162:10-162:12	NT		
162:16-162:16	RV/SP/LC/IH		
163:12-163:14	NT		
163:17-163:24	RV/SP/LC		
164:2-164:7	RV/FM/LC		
164:10-164:10	RV/SP		
164:13-164:16	NT		
164:19-164:21	RV/FM		
165:7-165:11	RV		
165:15-165:20	RV/IH/SP/AF		
168:23-169:1	NT		
169:5-169:6	RV/IH/FM/SP/LC		
174:14-174:16	NT		
174:20-174:25	RV/IH/SP		
175:10-175:13	RV		

Defendants' Designations	Plaintiff's Objections to Defendants' Designations	Plaintiff's Counter Designations	Defendants' Objections to Plaintiff's Counter Designations
176:4-176:6	NT		
176:10-176:11	RV/FM/SP/LC		
176:12-176:16	RV		
177:1-177:1	NT		
177:4-177:7	RV/FM		
177:9-177:9	RV/FM		
177:10-177:14	NT		
177:18-177:24	RV/FM/SP/LC		
178:2-178:2	RV/LC	178:22-180:14	
182:3-182:5	NT		
182:8-182:19	RV/FM		
182:22-182:23	NT		
182:25-183:2	RV/FM/LC		
183:6-183:8	RV/FM/LC		
183:10-183:10	RV/FM/LC		
184:6-184:10	RV		
184:25-185:1	NT		
185:3-185:3	RV/FM		
187:6-187:12	RV		
187:20-187:21	NT		
187:24-188:10	RV/FM/IH		
188:13-188:13	RV/FM		

Objection Key:

1. **AA:** Asked and answered
2. **AR:** Argumentative
3. **AF:** Assumes facts not in evidence
4. **FD:** Foundation
5. **FM:** Form

6. **HR:** Hearsay
7. **IH:** Incomplete hypothetical
8. **LC:** Legal Conclusion
9. **LD:** Leading
10. **MD:** Mischaracterizes document
11. **MR:** Misstates the record
12. **NA:** Not authenticated
13. **NT:** Not Testimony/Attorney Colloquy
14. **NR:** Not responsive to question
15. **PV:** Privileged
16. **PR:** Prejudicial
17. **RV:** Relevance
18. **SP:** Calls for speculation

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2022, a copy of the foregoing was filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's system.